

GARY A. BORNSTEIN (*pro hac vice*)

gbornstein@cravath.com

YONATAN EVEN (*pro hac vice*)

yeven@cravath.com

LAUREN A. MOSKOWITZ (*pro hac vice*)

lmoskowitz@cravath.com

JUSTIN C. CLARKE (*pro hac vice*)

jcclarke@cravath.com

MICHAEL J. ZAKEN (*pro hac vice*)

mzaken@cravath.com

M. BRENT BYARS (*pro hac vice*)

mbyars@cravath.com

**CRAVATH, SWAINE & MOORE LLP**

375 Ninth Avenue

New York, New York 10001

Telephone: (212) 474-1000

Facsimile: (212) 474-3700

PAUL J. RIEHLE (SBN 115199)

paul.riehle@faegredrinker.com

**FAEGRE DRINKER BIDDLE & REATH LLP**

Four Embarcadero Center

San Francisco, California 94111

Telephone: (415) 591-7500

Facsimile: (415) 591-7510

*Attorneys for Plaintiff and Counter-defendant  
Epic Games, Inc.*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**OAKLAND DIVISION**

EPIC GAMES, INC.,

Plaintiff, Counter-defendant,

v.

APPLE INC.,

Defendant, Counterclaimant.

Case No. 4:20-CV-05640-YGR-TSH

**PLAINTIFF'S ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED PURSUANT TO  
CIVIL LOCAL RULE 79-5**

Judge: Hon. Thomas S. Hixson

PLAINTIFF'S ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER PARTY'S  
MATERIAL SHOULD BE SEALED

CASE No. 4:20-CV-05640-YGR-TSH

Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiff Epic Games, Inc. (“Epic”) submits this administrative motion to consider whether another party’s material should be sealed with respect to the Objections to Certain Special Master Determinations Issued February 12 and February 14, 2025, Regarding Apple’s Re-Reviewed Documents, the Declaration of Yonatan Even (“Even Declaration”) and Exhibit A, all dated February 18, 2025. The document Epic seeks to temporarily file under seal is listed below:

Document	Corresponding Page and Line Number(s)
Exhibit A to the Even Declaration	Document in its entirety.

Epic seeks leave to provisionally file the document under seal because it discusses materials that Apple has designated confidential under the protective order in this case. *See* Local Rule 79-5(f). Epic reserves the right to oppose, under Rule 79-5(f)(4), any submission Apple makes to support sealing under Rule 79-5(f)(3). Epic also hereby provides notice of lodging to all parties and their counsel pursuant to Civil Local Rule 79-5(f).

1 Dated: February 18, 2025

Respectfully submitted,

2 By: /s/ Yonatan Even

3 **FAEGRE DRINKER BIDDLE & REATH**  
4 **LLP**

5 Paul J. Riehle (SBN 115199)  
6 paul.riehle@faegredrinker.com

7 Four Embarcadero Center  
8 San Francisco, California 94111  
9 Telephone: (415) 591-7500  
Facsimile: (415) 591-7510

10 **CRAVATH, SWAINE & MOORE LLP**

11 Gary A. Bornstein (*pro hac vice*)  
12 gbornstein@cravath.com  
13 Yonatan Even (*pro hac vice*)  
yeven@cravath.com  
14 Lauren A. Moskowitz (*pro hac vice*)  
lmoskowitz@cravath.com  
15 Justin C. Clarke (*pro hac vice*)  
jcclarke@cravath.com  
16 Michael J. Zaken (*pro hac vice*)  
mzaken@cravath.com  
17 M. Brent Byars (*pro hac vice*)  
mbyars@cravath.com

18 375 Ninth Avenue  
19 New York, New York 10001  
20 Telephone: (212) 474-1000  
Facsimile: (212) 474-3700

21 *Attorneys for Plaintiff and Counter-defendant*  
22 *Epic Games, Inc.*